

EXHIBIT 1

Curling v. Raffensperger

Opening

The Duties of the State Election Board

The cornerstone of any democracy is a citizen's exercise of their right to vote—to select their leaders, policymakers, and administrators. In some cases, it is a vote to support a new statute, a policy initiative, to amend the state constitution and, in rare cases, to remove a person from public office. In Georgia, it is deciding who will serve as members of our judiciary. Voting is, indeed, the most fundamental act of citizenship and public voting sets the foundation upon which cities, counties, states and the national government are empowered to function. In short, voting is an essential and precious right. Those who choose to participate in the voting process do so because voting is something they value. Voting is the citizen's voice in their government.

About the State Election Board, <https://sos.ga.gov/page/about-state-election-board> (last visited Jan. 9, 2024)

About The State Election Board

[The Elections Division](#) ▾ [Voter Information](#) ▾ [Stop Voter Fraud](#) [Candidate Qualification](#) [Election Results and Stats](#)

[Home](#) > [The Elections Division of the Georgia Secretary of State's Office](#) > [State Election Board](#) > About The State Election Board



State Election Board

The Duties of the State Election Board

The cornerstone of any democracy is a citizen's exercise of their right to vote—to select their leaders, policymakers, and administrators. In some cases, it is a vote to support a new statute, a policy initiative, to amend the state constitution and, in rare cases, to remove a person from public office. In Georgia, it is deciding who will serve as members of our judiciary. Voting is, indeed, the most fundamental act of citizenship and public voting sets the foundation upon which cities, counties, states and the national government are empowered to function. In short, voting is an essential and precious right. Those who choose to participate in the voting process do so because voting is something they value. Voting is the citizen's voice in their government.

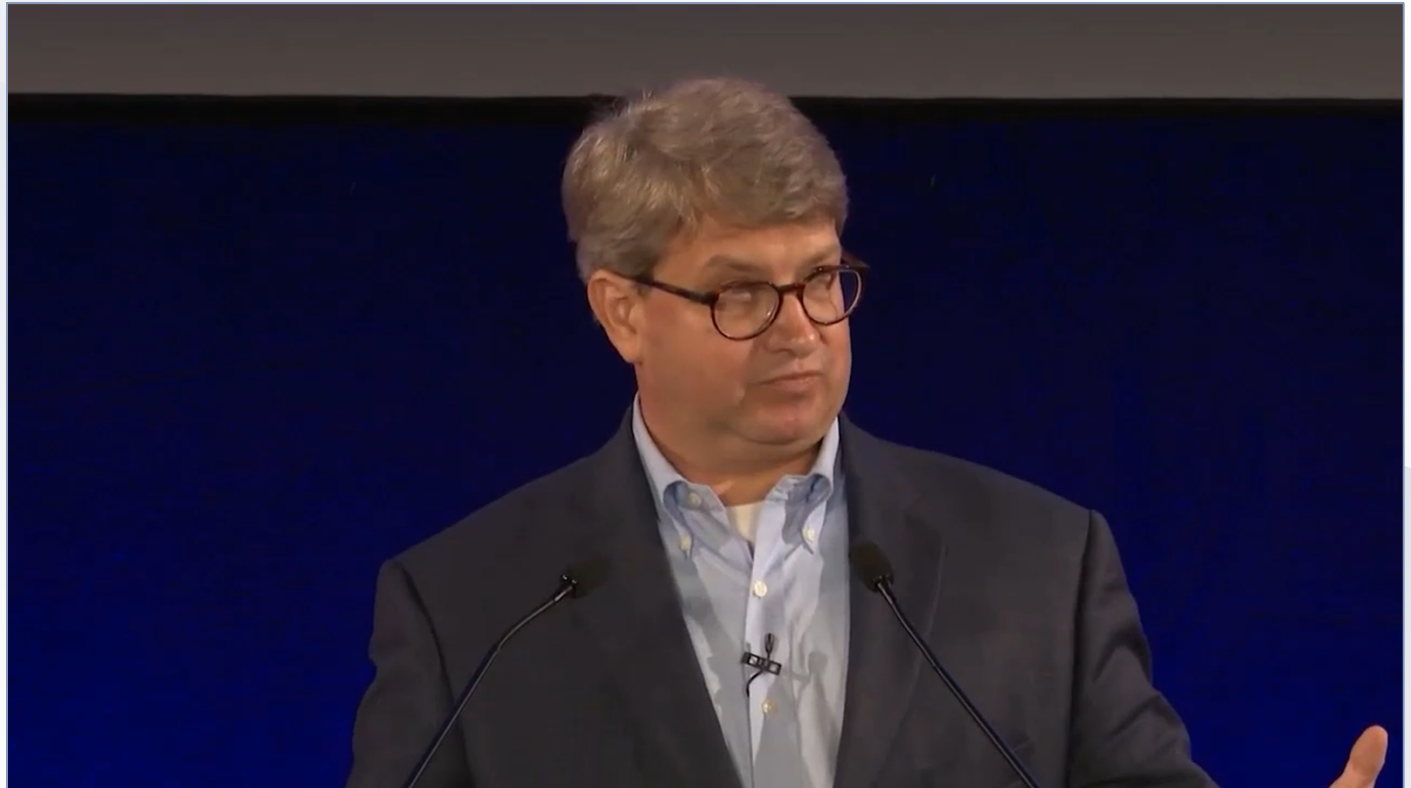
About the State Election Board, <https://sos.ga.gov/page/about-state-election-board> (last visited Jan. 9, 2024)

October 12, 2022



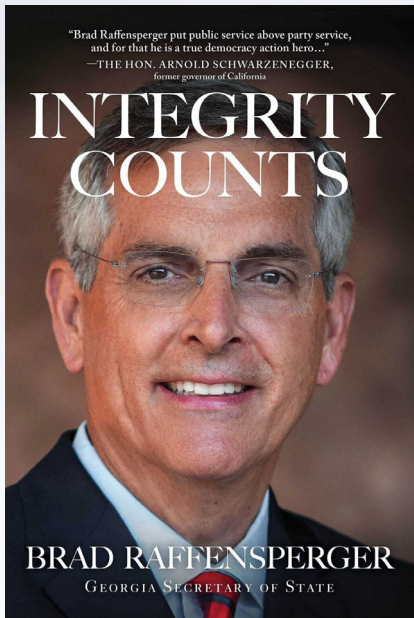
Gabriel Sterling

Secretary of State's Office
Chief Operating Officer



PX503, How to safeguard democracy?, Université de Genève, (Oct. 4, 2021, uploaded Nov. 25, 2021)

***Integrity Counts* (2021), Brad Raffensperger**



“Every politician has a stump speech, and mine went something like this:

As an engineer, I think about the machinery of elections. I think about the process. What can we do to make the process more **transparent? What can we do to make the process more accessible, more **accurate**, and make sure the process is objectively fair?**

I think about whether Georgians **subjectively trust the results of that process.”**

Halderman & CISA Find Numerous Serious Vulnerabilities



Dr. J. Alex Halderman

Ph.D in Computer Science,
Princeton University

Bredt Family Professor
of Computer Science &
Engineering,
University of Michigan

Security Analysis of Georgia's ImageCast X Ballot Marking Devices

Expert Report Submitted on Behalf of Plaintiffs Donna Curling, et al.
Curling v. Raffensperger, Civil Action No. 1:17-CV-2989-AT
U.S. District Court for the Northern District of Georgia, Atlanta Division

Prof. J. Alex Halderman, Ph.D.

With the assistance of Prof. Drew Springall, Ph.D.

July 1, 2021



PX425, July 1, 2021 Halderman Report

February 10, 2022



Brad Raffensperger

Secretary of State



PX491, Atlanta Press Club, 2022 Newsmaker Leadership Series with Brad Raffensperger (Feb. 10, 2022)

[Video Montage]

PX493, Coffee County Surveillance Videos

SOS Dismisses Leading Experts as Election Deniers



Jordan Fuchs

Deputy
Secretary of State

“We don’t negotiate with election deniers. If they have an idea that wouldn’t take Georgia back to the days of hanging chads and stuffed ballot boxes, they should offer it.”

Mark Niese, *Trial set for election security case against Georgia’s voting machines*, Atlanta Journal-Constitution (Nov. 13, 2023), <https://www.ajc.com/politics/georgia-election-security-trial-set-as-judge-proposes-a-compromise/LA63ROLPNBGZBBPBGSFRRNV2MM/>

“If the PhDs don’t like being put in the same category as the Pillow salesman, tough noogies. They should stop saying similar things.”

John Sakellariadis, *From election hero to zero: Georgia official’s dismissal of security audit could mean trouble in 2024*, Politico (June 23, 2023), <https://www.politico.com/news/2023/06/23/brad-raffensperger-georgia-dominion-voting-00103298>



Mike Hassinger

Spokesperson
Secretary of State

SOS Expert Endorses Drs. Halderman and Appel



Dr. Juan Gilbert

University of Florida

State's Retained Expert

A. ~~On October 29, 2021~~ If I was asked the question, ‘I have an election system. We need someone to evaluate the security of it to find vulnerabilities,’ at the top of my list would be Appel, Halderman. That’s where I would start.”

Integrity Counts (2021), Brad Raffensperger



Brad Raffensperger

Secretary of State

“The **ultimate fact-check** in the United States, however, occurs in courts of law, where witnesses swear to tell the truth or risk imprisonment and where lawyers must also tell the truth or risk disbarment.

If you want to know the truth, watch what happens in court.”



Brad Raffensperger

Secretary of State



The Curling Plaintiffs

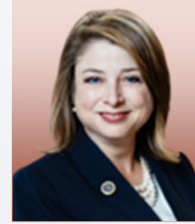
State Election Board



**Didn't read
Halderman report**

8/23/2022

Janice W. Johnston, M.D.



**Didn't read
Halderman report**

11/5/2021

Rebecca Sullivan
(Former)



**Didn't read
Halderman report**

11/4/2021

Matthew Mashburn

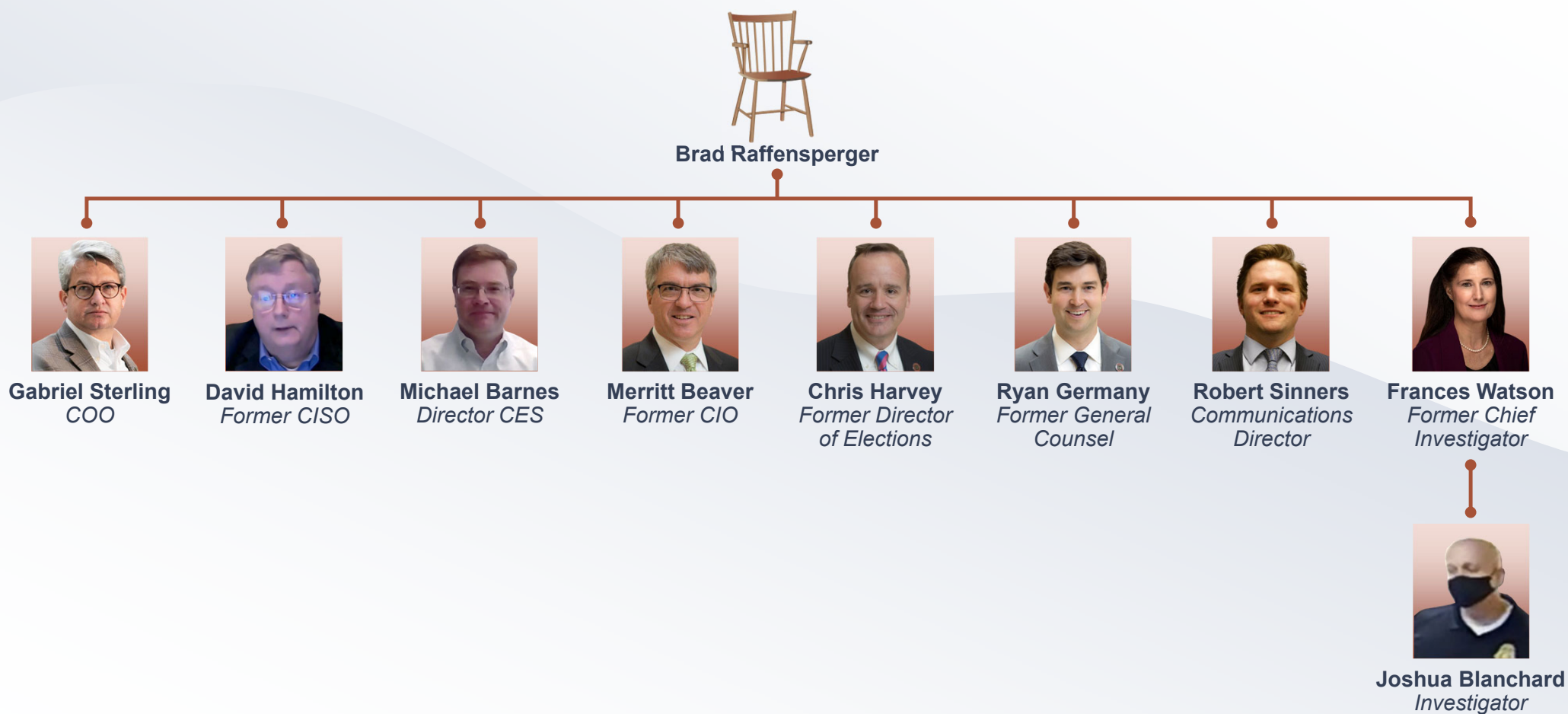


**Didn't read
Halderman report**

11/5/2021

Sara Tindall Ghazal

SOS Cast of Characters



SOS Cast of Characters



Brad Raffensperger



David Hamilton
Former CISO



Michael Barnes
Director CES



Merritt Beaver
Former CIO



Chris Harvey
*Former Director
of Elections*



Ryan Germany
*Former General
Counsel*



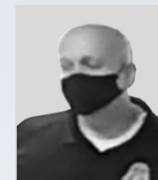
Robert Sinners
*Communications
Director*



Frances Watson
*Former Chief
Investigator*



Gabriel Sterling
COO



Joshua Blanchard
Investigator

August 10, 2021



Gabriel Sterling

Secretary of State's Office
Chief Operating Officer

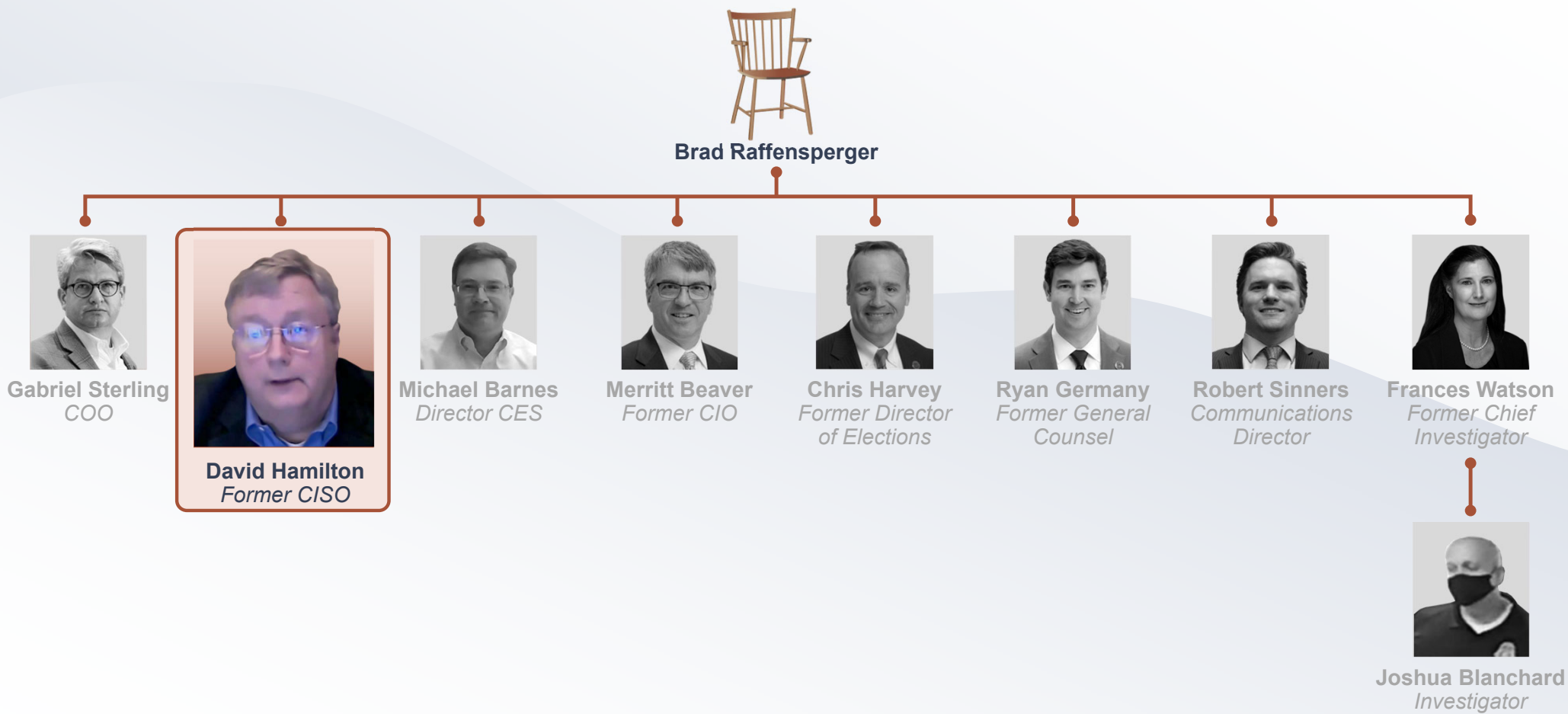
- **Publicly dismisses Dr. Halderman's report as a "load of crap"**

PX492, Gabriel Sterling, *Leadership in a Time of Crisis*, Sandy Springs Perimeter Chamber of Commerce (Aug. 10, 2021)

- **Mr. Sterling had not read the report**

2/24/21 Sterling Dep. at 23:16-18

SOS Cast of Characters



January 18, 2022

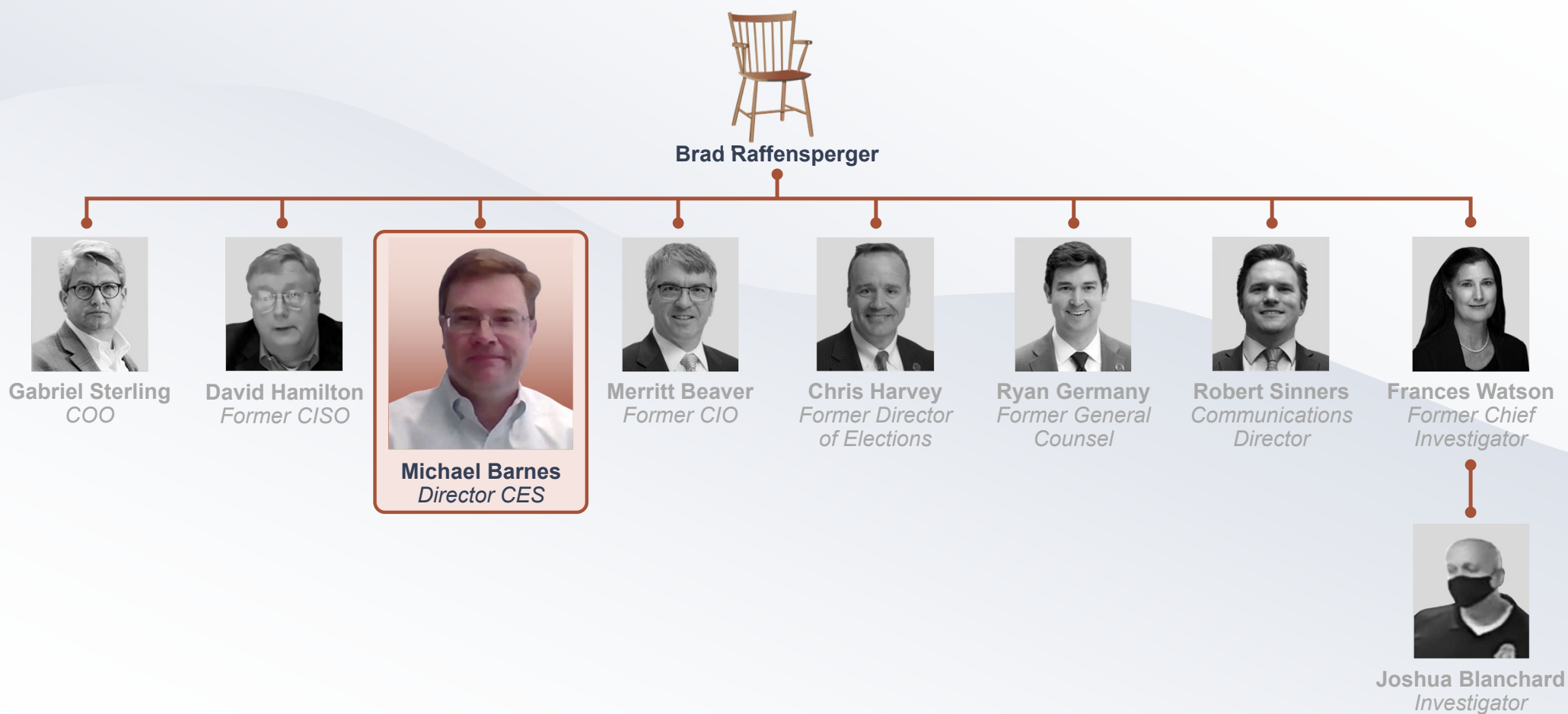


David Hamilton

Secretary of State's Office
Former Chief Information
Security Officer
(2018-June 2021)

- **Was not made aware of Dr. Halderman's findings**
- **Would have liked to know about them**

SOS Cast of Characters



February 11, 2022

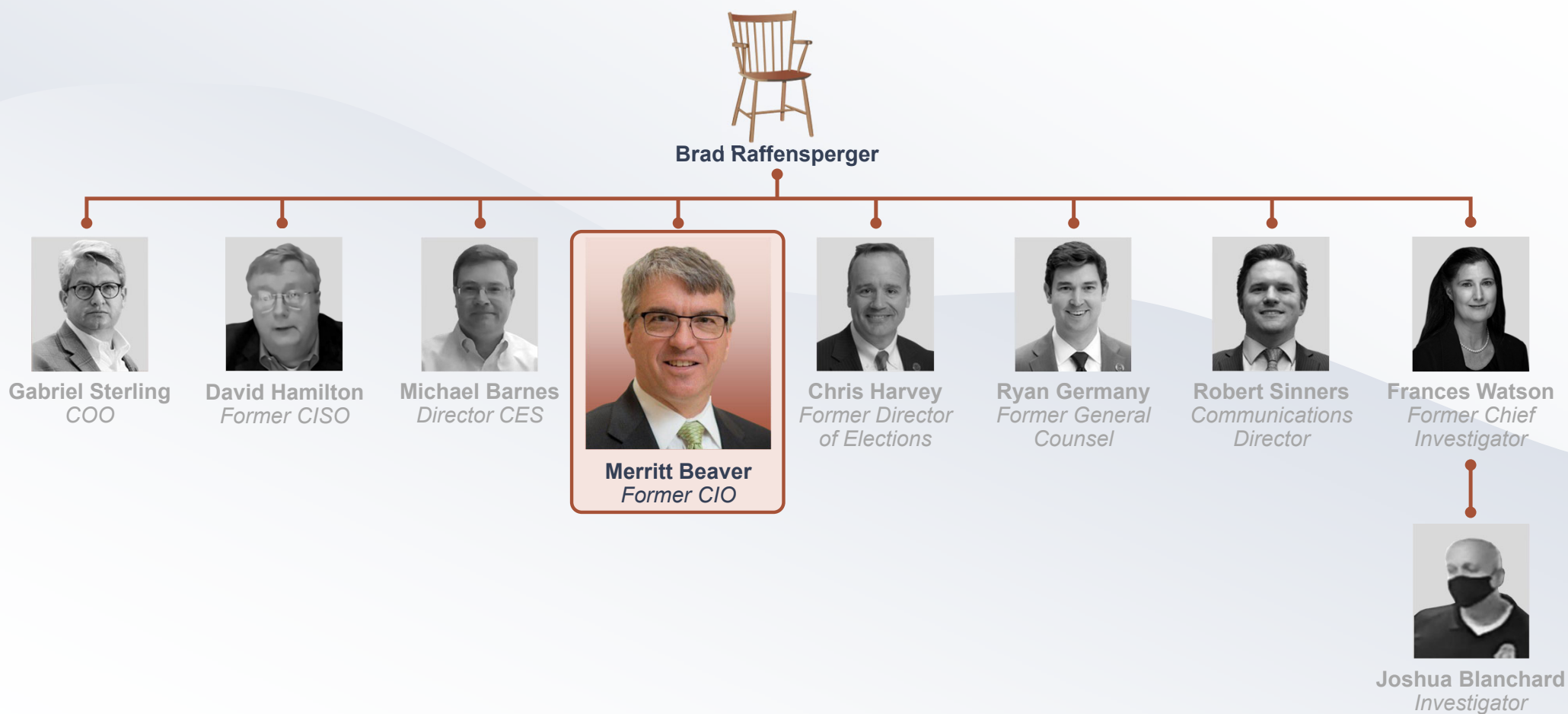


Michael Barnes

Secretary of State's Office
Director of Center
for Election Services

- **Only awareness of Dr. Halderman's report came from news article in 2022**

SOS Cast of Characters



February – March 2022

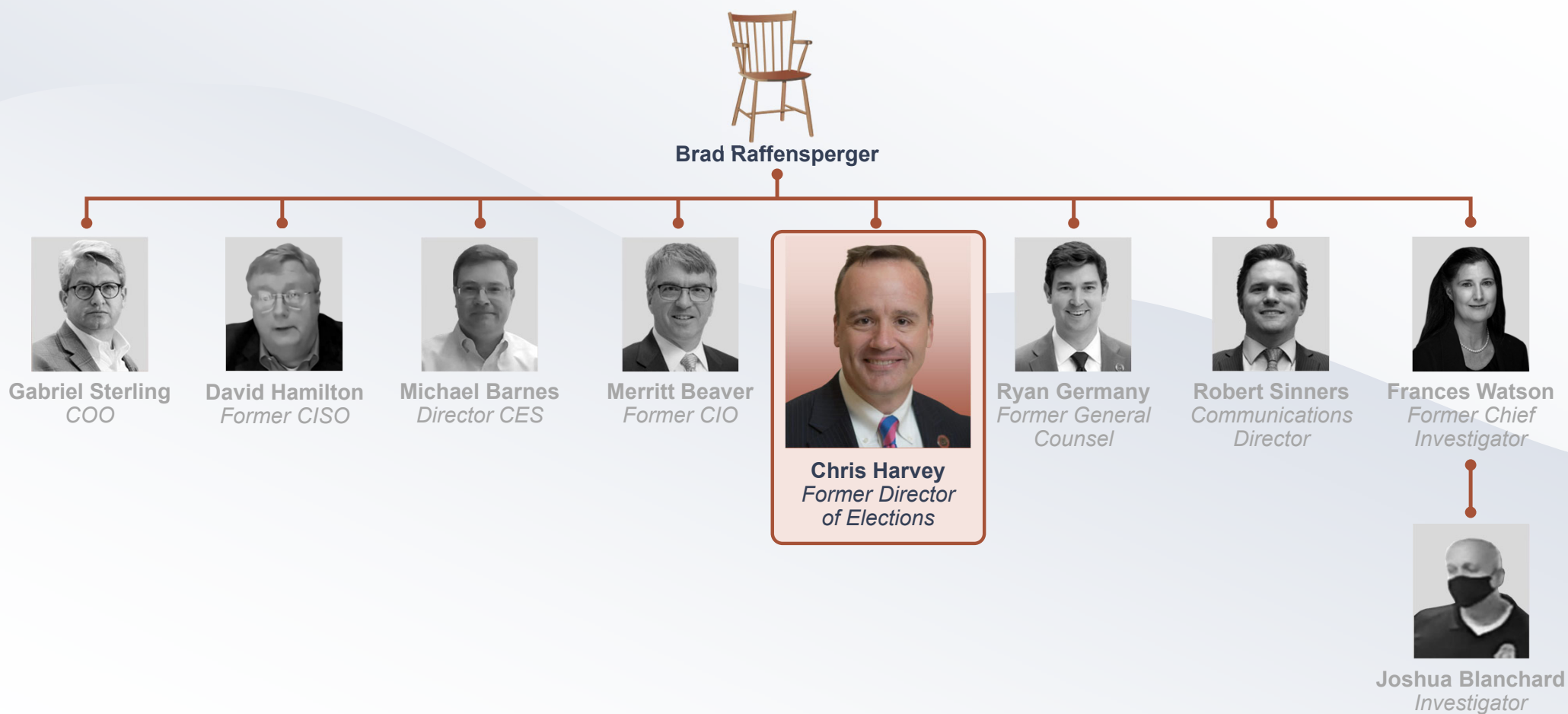


Merritt Beaver

Secretary of State's Office
Former Chief
Information Officer
(2013-2023)

- **Halderman Report: “I have never heard of that document, never seen that document”**
2/2/2022 Beaver Dep. at 155:10-18
- **Election software is not given to the public because “you’re giving them a road map to how to basically get in and access the system.”**
3/10/2022 Beaver Dep. at 417:6-15

SOS Cast of Characters



January 28, 2022



Chris Harvey

Secretary of State's Office
Former Elections Director
(2015-July 2021)

“You know, we had 159 counties with 159 levels of experience and interest and knowledge and courage, I mean, all these different factors. And you know, any one of those could have been a weak point.”

Halderman & CISA Find Numerous Serious Vulnerabilities

July 1, 2021



Dr. J. Alex Halderman

Ph.D in Computer Science,
Princeton University

Bredt Family Professor
of Computer Science &
Engineering,
University of Michigan

Security Analysis of Georgia's ImageCast X Ballot Marking Devices

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PX425, July 1, 2021 Halderman Report

Halderman & CISA Find Numerous Serious Vulnerabilities

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Dr. J. Alex Halderman

Ph.D in Computer Science,
Princeton University

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U.S. District Court for the Northern District of Georgia

Prof. J. Alex Halderman, Ph.D.

Witness: Dr. Christopher A. Weiss, Ph.D.

July 1, 2021

UNREFUTED



PX425, July 1, 2021 Halderman Report

Voters Cannot Read QR Codes

**FAYETTE COUNTY
OFFICIAL BALLOT
GENERAL AND SPECIAL ELECTION
OF THE STATE OF GEORGIA
NOVEMBER 3, 2020**

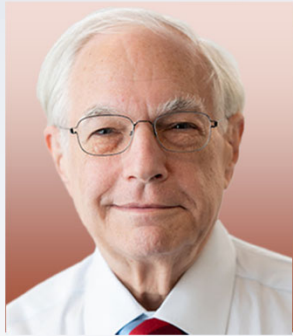
"I understand that the offer or acceptance of money or any other object of value to vote for any particular candidate, list of candidates, issue, or list of issues included in this election constitutes an act of voter fraud and is a felony under Georgia law." [O.C.G.A. 21-2-284(e), 21-2-285(h) and 21-2-383(a)]

376-Shakerag East



SOS Expert Advises Against QR Codes

July 19, 2019



“I’ll say, first, I’m not a fan of bar codes.”

Dr. Michael I. Shamos

*Ph.D Carnegie Mellon
University*


Former State Expert

Verifying BMD-Ballot by Voters Is Burdensome and Infeasible

FAYETTE COUNTY
OFFICIAL BALLOT
DEMOCRATIC PARTY PRIMARY AND NONPARTISAN GENERAL ELECTION
OF THE STATE OF GEORGIA
MAY 19, 2020

"I understand that the offer or acceptance of money or any other object of value to vote for any particular candidate, list of candidates, issue, or list of issues included in this election constitutes an act of voter fraud and is a felony under Georgia law." [O.C.G.A. 21-2-284(e) and 21-2-383(a)]

351-Blackrock



For President of the United States (Vote for One) (DEM) Vote for Joseph R. Biden	For State Representative In the General Assembly From 64th District (Vote for One) (DEM) Vote for Derrick L. Jackson (I)	For Justice, Supreme Court of Georgia (Vote for One) (NP) Vote for Charlie Bethel (I)
For United States Senate (Vote for One) (DEM) Vote for Tricia Carpenter McCracken	For Sheriff (Vote for One) (DEM) Vote for Chris Pigors	For Justice, Supreme Court of Georgia (Vote for One) (NP) Vote for Sarah Hawkins Warren (I)
For Public Service Commissioner (Vote for One) (DEM) Vote for Robert G. Bryant	For County Commissioner District 5 (Vote for One) (DEM) Vote for William Lightle	For Judge, Court of Appeals of Georgia (Vote for One) (NP) Vote for Trenton "Trent" Brown, III (I)
For Public Service Commissioner (Vote for One) (DEM) Vote for Daniel Blackman	Democratic Party Question 1 (DEM) Vote for YES	For Judge, Court of Appeals of Georgia (Vote for One) (NP) Vote for Christian Coomer (I)
For U.S. Representative in 117th Congress From the 3rd Congressional District of Georgia (Vote for One) (DEM) Vote for Val Almonord	Democratic Party Question 2 (DEM) Vote for YES	For Judge, Court of Appeals of Georgia (Vote for One) (NP) Vote for Sara Doyle (I)
For State Senator From 34th District (Vote for One) (DEM) Vote for Valencia M. Seay (I)	Democratic Party Question 3 (DEM) Vote for YES	For Judge, Court of Appeals of Georgia (Vote for One) (NP) Vote for Elizabeth Dallas Gobeil (I)
	Democratic Party Question 4 (DEM) Vote for YES	For Judge, Court of Appeals of Georgia (Vote for One) (NP) Vote for David Todd Markle (I)
	Democratic Party Question 5 (DEM) Vote for YES	
	Democratic Party Question 6 (DEM) Vote for YES	

1/2

Curling Plaintiffs' Exhibit
385
Civ Case No. 1:17-cv-02989-AT

PLAINTIFF EXHIBIT
1
1:17-cv-02989

Curling Plaintiffs' Exhibit 385, page 1 of 3

For Judge, Court of Appeals of Georgia (Vote for One) (NP)
Vote for Carla McMillian (I)

For Judge, Superior Court of the Griffin Judicial Circuit (Vote for One) (NP)
Vote for Scott L. Ballard (I)

For Judge, Superior Court of the Griffin Judicial Circuit (Vote for One) (NP)
Vote for W. Fletcher Sams (I)

For Judge of Magistrate Court Post 1 (Vote for One) (NP)
Vote for Christy Dunkelberger (I)

For Judge of Magistrate Court Post 2 (Vote for One) (NP)
Vote for Kathy Brown Valencia (I)

For Judge of Magistrate Court Post 3 (Vote for One) (NP)
Vote for Robert "Bob" Ruppenthal (I)

For Judge of Magistrate Court Post 4 (Vote for One) (NP)
Vote for James A. White (I)

Democratic Party Question 1 (DEM)
Vote for YES

Democratic Party Question 2 (DEM)
Vote for YES

Democratic Party Question 3 (DEM)
Vote for YES

Democratic Party Question 4 (DEM)
Vote for YES

Democratic Party Question 5 (DEM)
Vote for YES

Democratic Party Question 6 (DEM)
Vote for YES

2/2

PX385, Fayette County ballot demonstrative, Sept. 11, 2020 PI Hearing (Dkt. 892-3)

Verifying BMD-Ballot by Voters Is Burdensome and Infeasible

FAYETTE COUNTY OFFICIAL BALLOT GENERAL AND SPECIAL ELECTION OF THE STATE OF GEORGIA NOVEMBER 3, 2020

*"I understand that the offer or acceptance of money or any other object of value to vote for any particular candidate, list of candidates, issue, or list of issues included in this election constitutes an act of voter fraud and is a felony under Georgia law. * [O.C.G.A. 21-2-284(e), 21-2-285(h) and 21-2-383(a)]*

376-Shakerag East



For President of the United States (Vote for One) (NP) Vote for Donald J. Trump (I) (Rep)	For State Representative In the General Assembly From 72nd District (Vote for One) (NP) Vote for Josh Bonner (I) (Rep)	For County Commissioner District 5 (Vote for One) (NP) Vote for Charles W. Oddo (I) (Rep)
For United States Senate (Perdue) (Vote for One) (NP) Vote for David A. Perdue (I) (Rep)	For Judge of the Probate Court (Vote for One) (NP) Vote for Ann S. Jackson (I) (Rep)	For County Board of Education District 1 (Vote for One) (NP) Vote for Randy Hough (Rep)
For United States Senate (Loeffler) - Special (Vote for One) (NP) Vote for Kelly Loeffler (I) (Rep)	For Clerk of Superior Court (Vote for One) (NP) Vote for Sheila Studdard (I) (Rep)	For County Board of Education District 5 (Vote for One) (NP) Vote for Brian Anderson (I) (Rep)
For Public Service Commissioner (Vote for One) (NP) Vote for Jason Shaw (I) (Rep)	For Sheriff (Vote for One) (NP) Vote for Chris Pigors (Dem)	Constitutional Amendment #1 (NP) Vote for YES
For Public Service Commissioner (Vote for One) (NP) Vote for Nathan Wilson (Lib)	For Tax Commissioner (Vote for One) (NP) Vote for Kristie King (I) (Rep)	Constitutional Amendment #2 (NP) Vote for NO
For U.S. Representative in 117th Congress From the 3rd Congressional District of Georgia (Vote for One) (NP) Vote for Drew Ferguson (I) (Rep)	For Coroner (Vote for One) (NP) Vote for W. Bee Huddleston (I) (Rep)	Statewide Referendum A (NP) Vote for NO
For State Senator From 16th District (Vote for One) (NP) Vote for Marty Harbin (I) (Rep)	For Solicitor-General (Vote for One) (NP) Vote for James K. Inagawa (I) (Rep)	Fayette Co School District Homestead Exemption - Special (Vote for One) (NP) Vote for NO
	For County Commissioner District 1 (Vote for One) (NP) Vote for Eric K. Maxwell (I) (Rep)	

1/1

For President of the United States (Vote for One) (NP) Vote for Donald J. Trump (I) (Rep)	For State Representative In the General Assembly From 72nd District (Vote for One) (NP) Vote for Josh Bonner (I) (Rep)	For County Commissioner District 5 (Vote for One) (NP) Vote for Charles W. Oddo (I) (Rep)
For United States Senate (Perdue) (Vote for One) (NP) Vote for David A. Perdue (I) (Rep)	For Judge of the Probate Court (Vote for One) (NP) Vote for Ann S. Jackson (I) (Rep)	For County Board of Education District 1 (Vote for One) (NP) Vote for Randy Hough (Rep)
For United States Senate (Loeffler) - Special (Vote for One) (NP) Vote for Kelly Loeffler (I) (Rep)	For Clerk of Superior Court (Vote for One) (NP) Vote for Sheila Studdard (I) (Rep)	For County Board of Education District 5 (Vote for One) (NP) Vote for Brian Anderson (I) (Rep)
For Public Service Commissioner (Vote for One) (NP) Vote for Jason Shaw (I) (Rep)	For Sheriff (Vote for One) (NP) Vote for Chris Pigors (Dem)	Constitutional Amendment #1 (NP) Vote for YES
For Public Service Commissioner (Vote for One) (NP) Vote for Nathan Wilson (Lib)	For Tax Commissioner (Vote for One) (NP) Vote for Kristie King (I) (Rep)	Constitutional Amendment #2 (NP) Vote for NO
For U.S. Representative in 117th Congress From the 3rd Congressional District of Georgia (Vote for One) (NP) Vote for Drew Ferguson (I) (Rep)	For Coroner (Vote for One) (NP) Vote for W. Bee Huddleston (I) (Rep)	Statewide Referendum A (NP) Vote for NO
For State Senator From 16th District (Vote for One) (NP) Vote for Marty Harbin (I) (Rep)	For Solicitor-General (Vote for One) (NP) Vote for James K. Inagawa (I) (Rep)	Fayette Co School District Homestead Exemption - Special (Vote for One) (NP) Vote for NO
	For County Commissioner District 1 (Vote for One) (NP) Vote for Eric K. Maxwell (I) (Rep)	

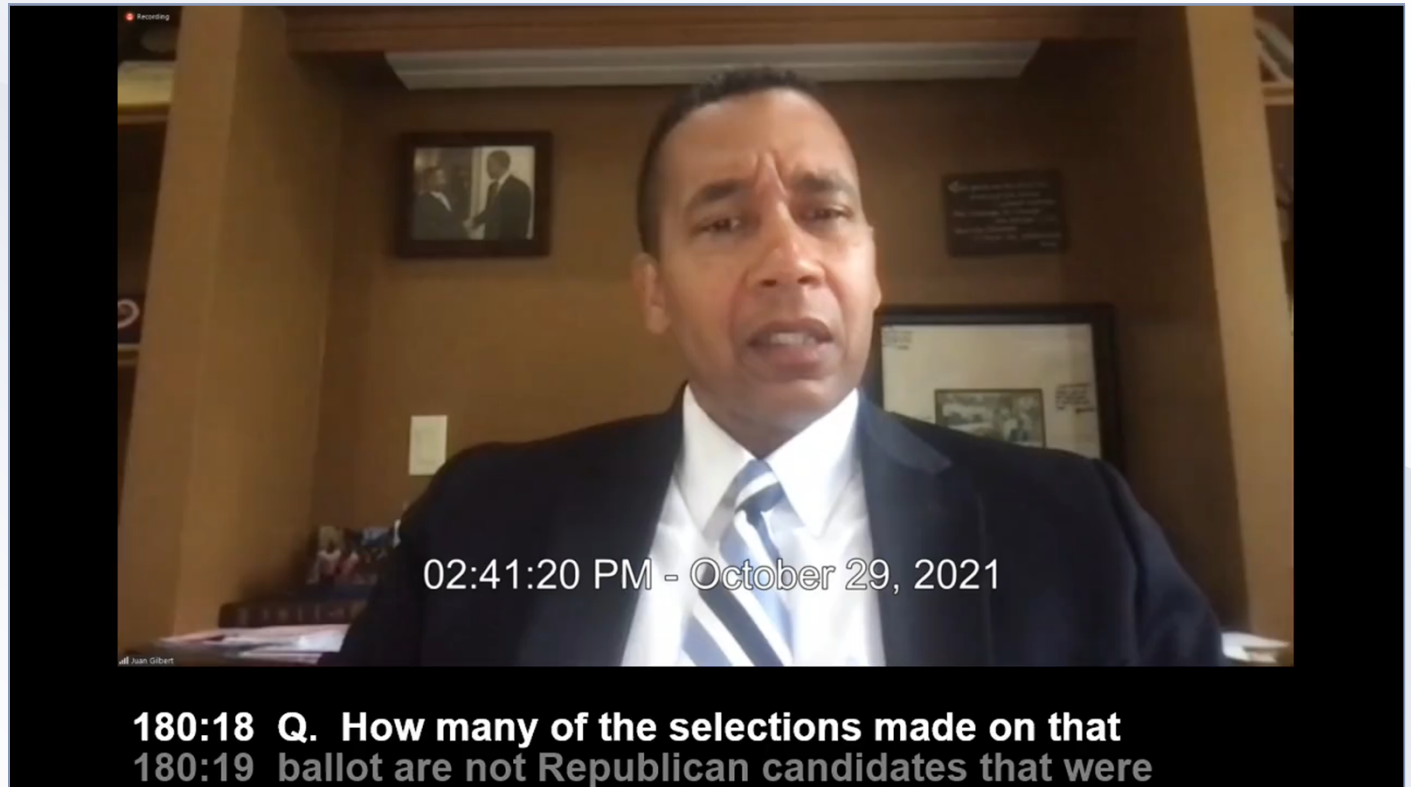
Verifying BMD-Ballot by Voters Is Burdensome and Infeasible



Dr. Juan Gilbert

University of Florida

State's Retained Expert



10/29/21 Dr. Juan Gilbert Dep. at 180:18-181:06

SOS Expert Agrees With Plaintiffs' Experts



Dr. Ben Adida

Executive Director
at VotingWorks

- “Our **default system** at VotingWorks [is] **HMPB+1BMD**”
- “Again, when a county asks what we recommend, **it’s always HMPB+1BMD**”

Coffee County Players

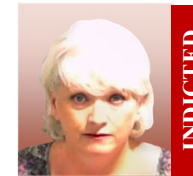
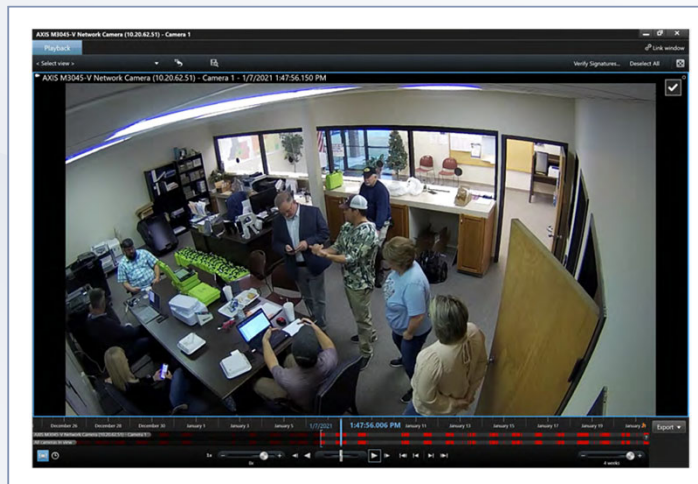
Coffee County:



Misty Hampton



Eric Chaney



Cathy Latham



Scott Hall



Sidney Powell



Doug Logan



Jeffrey Lenberg



Ben Cotton



Sullivan | Strickler



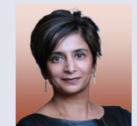
Paul Maggio



Greg Freemeyer



Jennifer Jackson

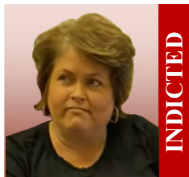


Karuna Naik

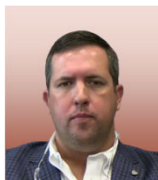
PX159, Jan. 7, 2021 Coffee County Surveillance Video Still Shots

Coffee County Players

Coffee County:



Misty Hampton



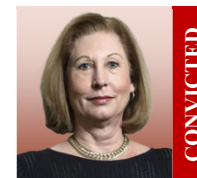
Eric Chaney

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Cathy Latham



Scott Hall



Sidney Powell



Doug Logan



Jeffrey Lenberg



Ben Cotton



Sullivan | Strickler



**Paul
Maggio**



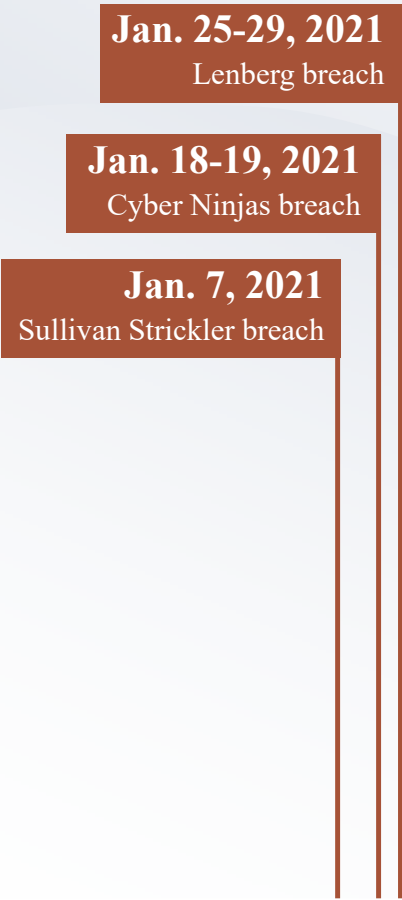
**Greg
Freemeyer**



Jennifer Jackson

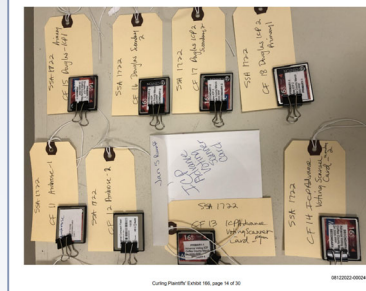
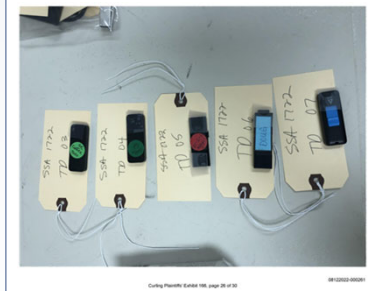
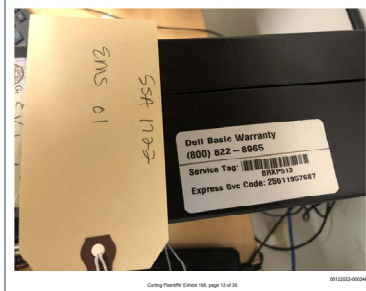
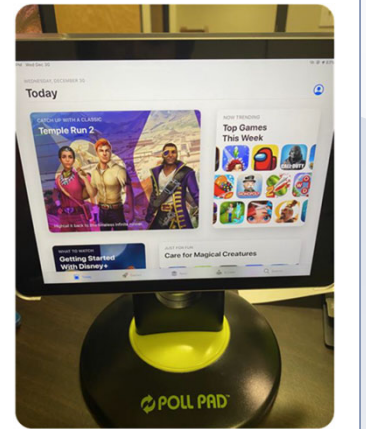
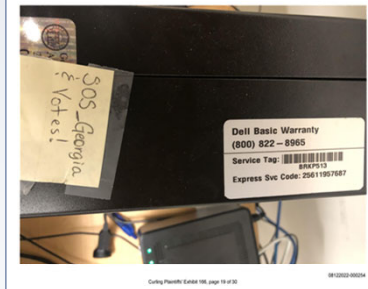
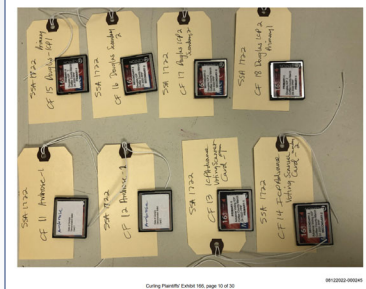
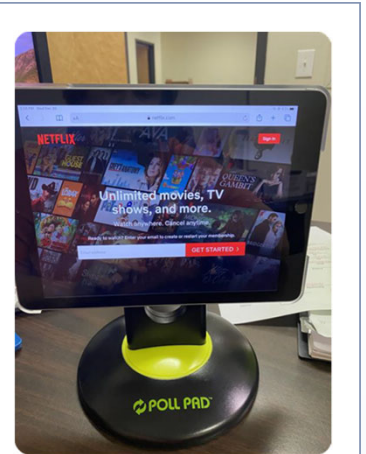
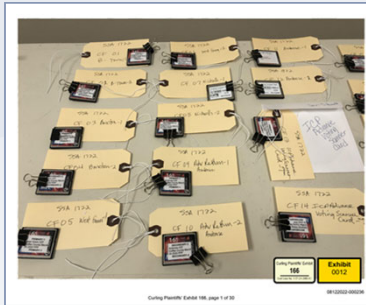


Coffee County Timeline



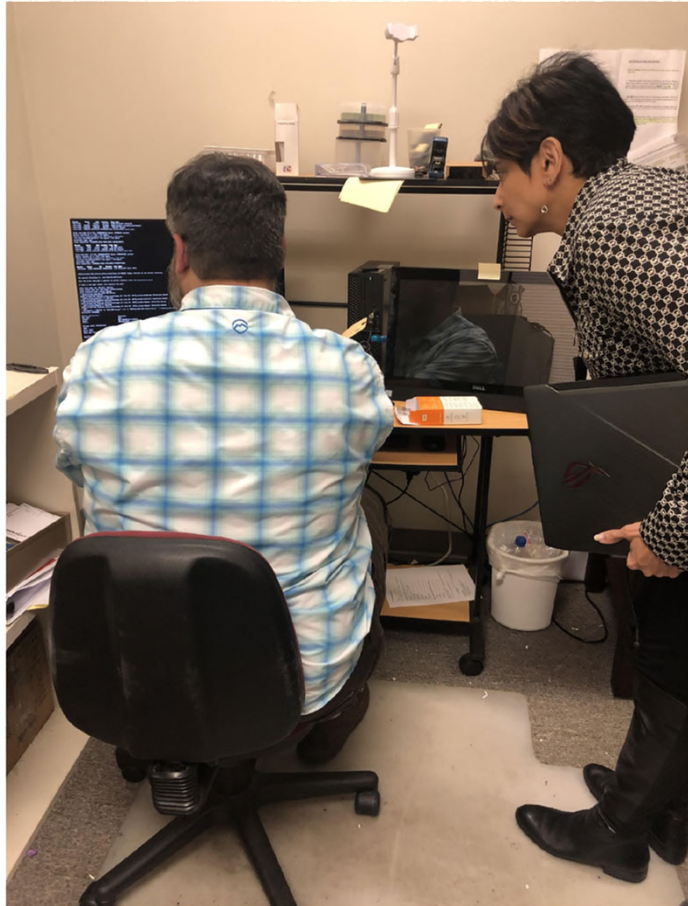
2020	2021	2022	2023
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“Roadmap” to Hack Georgia Voting System in the Wild



PX166 at 1, 3, 8, 9, 10, 13, 14, 19, 23, 26, 28, 30; PX110 at 19

“Roadmap” to Hack Georgia Voting System in the Wild



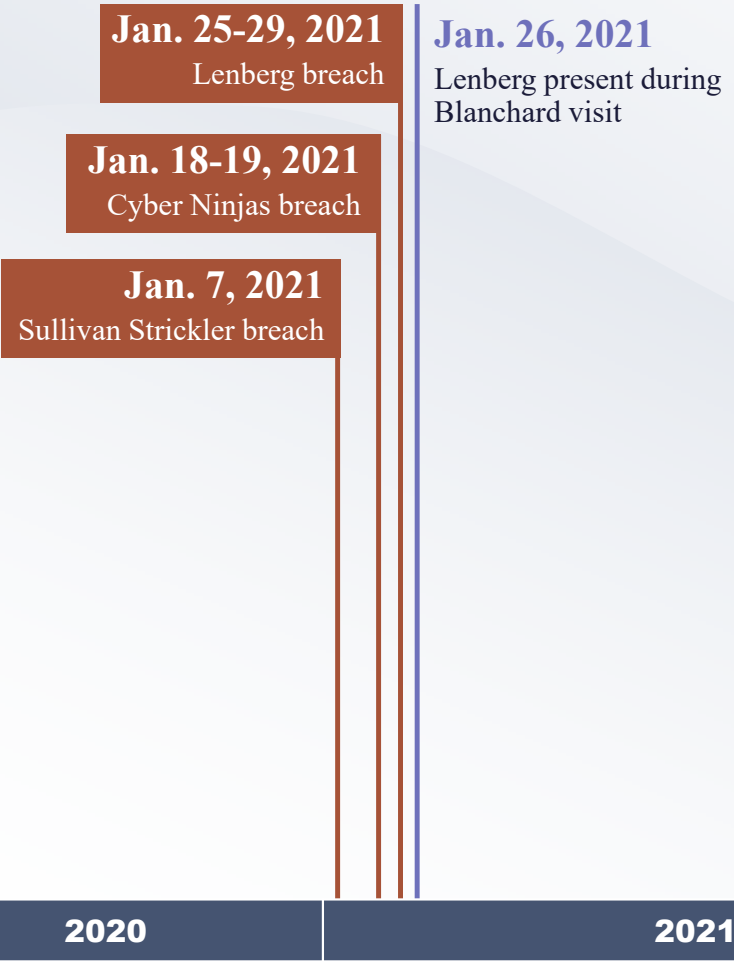
“It’s not real world.”



Brad Raffensperger
Secretary of State

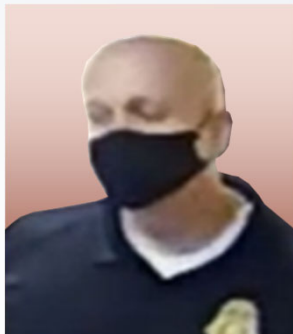
PX 166 at 5, All Photos – Maggio-000236 to 265

Coffee County Timeline



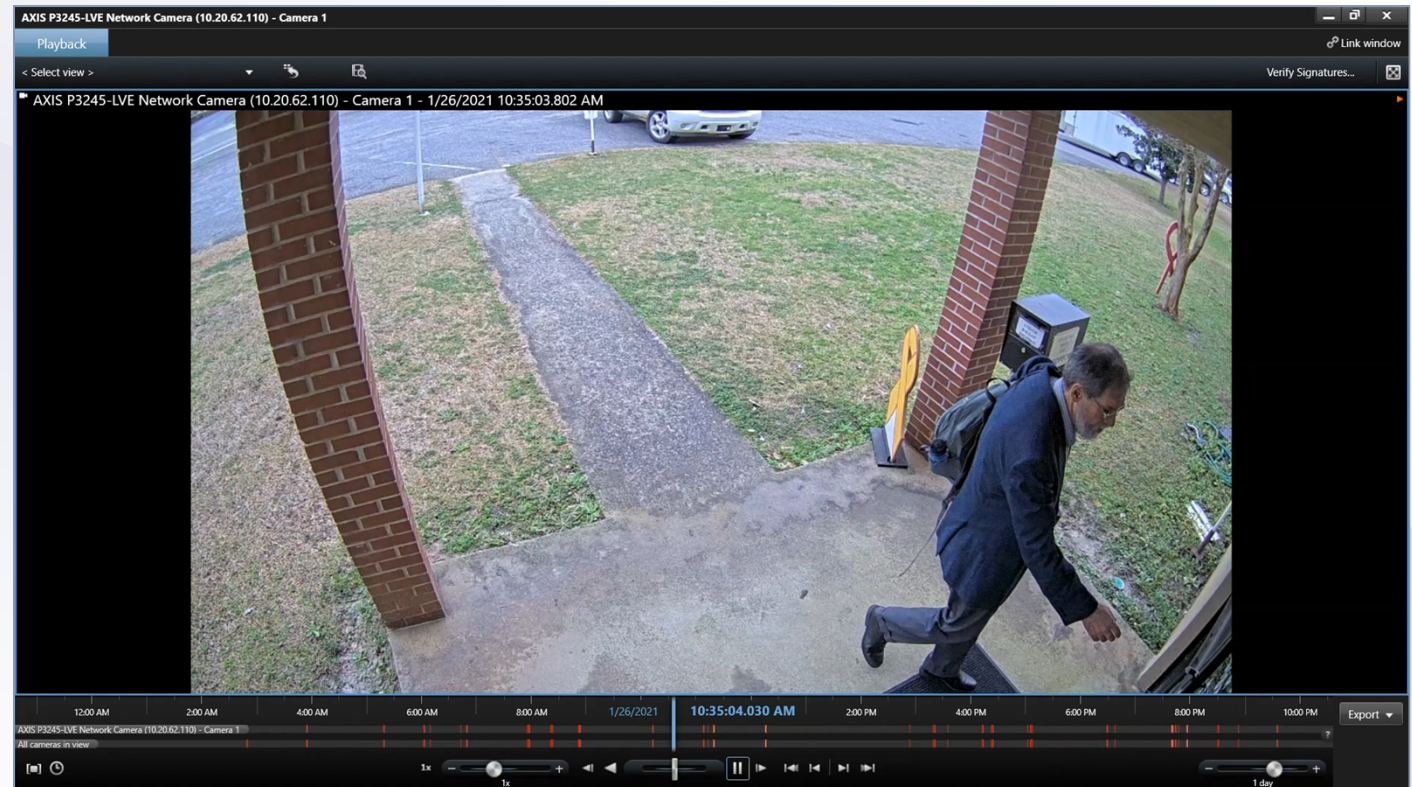


Jeffrey Lenberg



Joshua Blanchard

Investigator



Coffee County Timeline



Barnes Alerts SOS to Potential Cyber Ninjas Breach

May 7, 2021



Chris Harvey

**Secretary of State's
Office
Former Elections
Director
(2015-July 2021)**

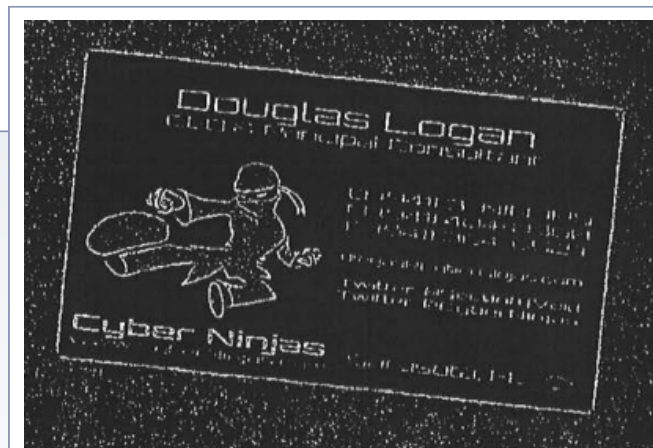
Vickers, Tracie

From: James Barnes
Sent: Friday, May 7, 2021 3:57 PM
To: wharvey@sos.ga.gov
Subject: Coffee County
Attachments: cyber ninja.pdf

Mr. Harvey,

The Dominion email today, pertaining to Cyber Ninjas, was alarming to me. When I took over at the Coffee County office the attached business card was at the base of Misty Hayes' computer monitor. I thought nothing of it until I heard about the situation in Arizona with the DOJ. If she did not use them, she was at the very least in contact.

James A. Barnes, Jr.
Supervisor of Elections
Coffee County
(912)-384-7018



Doug Logan

PX78 at 3-4, May 7, 2021 Email Re: CyberNinjas

SOS Launches Cyber Ninjas Breach Investigation

A. May 11, 2021



Frances Watson

Secretary of State's Office
Former Chief Investigator

From:

Sent: Tuesday, May 11, 2021 3:30 PM

To: Jones, Pamela

Subject: Fwd: Coffee County

Can you contact the county and verify what if any contact cyber ninjas had with any election equipment

Thanks
Get [Outlook for iOS](#)

From: Harvey, Chris [REDACTED]

Sent: Tuesday, May 11, 2021 2:58:33 PM

To: James Barnes [REDACTED]

Cc: Watson, Frances [REDACTED]; Barnes, Michael [REDACTED]

Subject: RE: Coffee County

James,

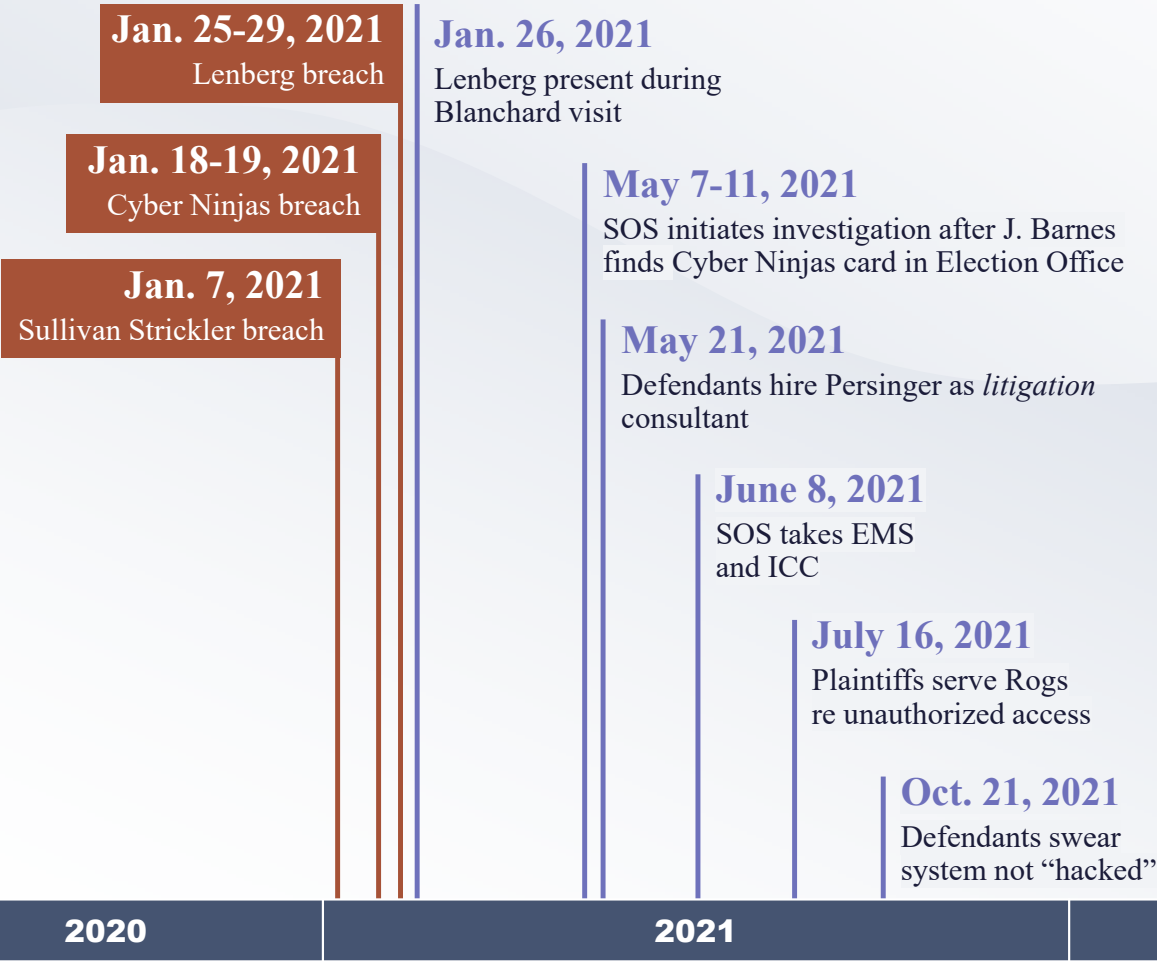
Thanks for sending this. I think it might be prudent to see if there has been any contact between the person on the card and anyone in your office and/or if they have had any access to any of your equipment.

I have let our investigations Division and CES know, and they might follow up with you. Let me know if you have questions or concerns.

Chris Harvey
Elections Director
Georgia Secretary of State

PX78 at 1, May 11, 2021 Emails Re: CyberNinjas

Coffee County Timeline



SOS COO Publicly Denies Any Breach in Coffee County

A. April 29, 2022



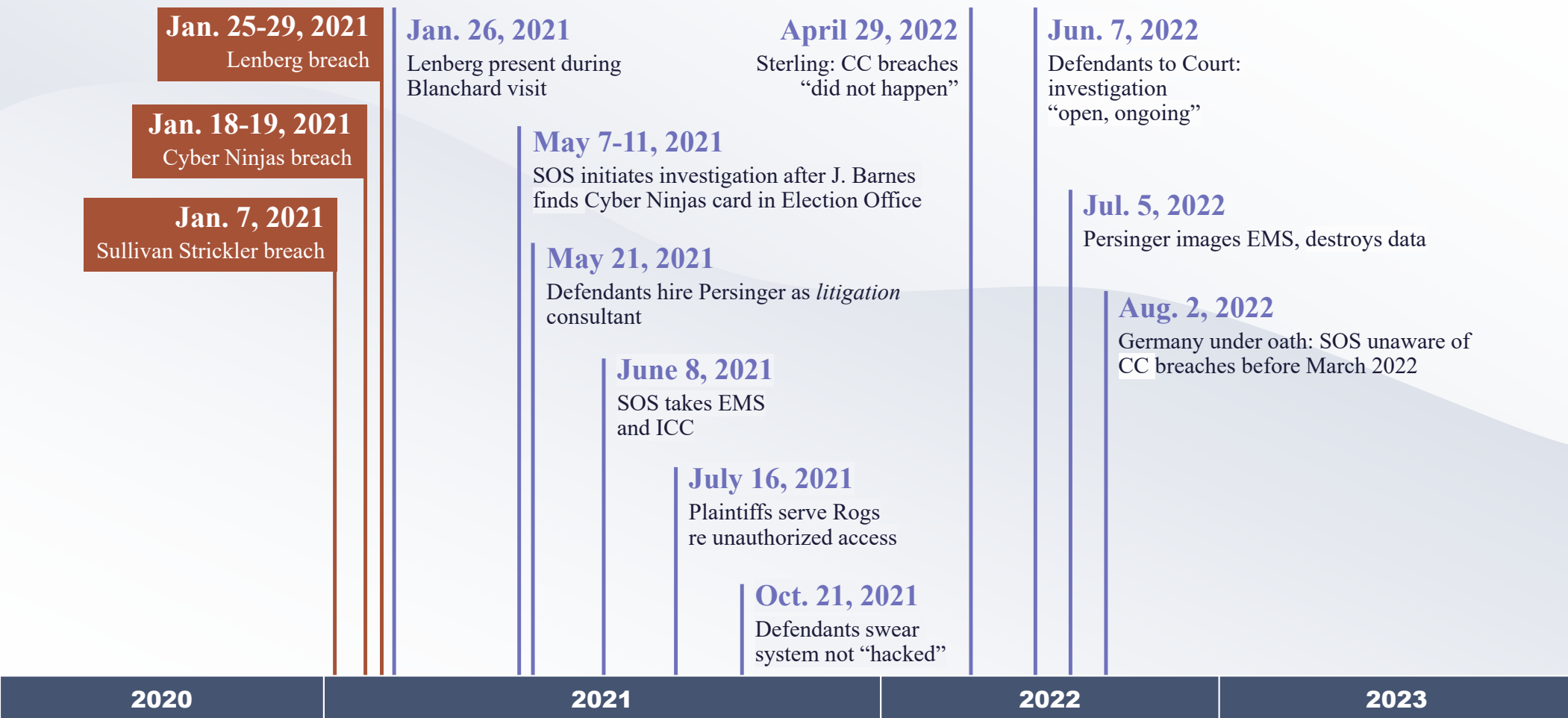
Gabriel Sterling

Secretary of State's Office
Chief Operating Officer



PX494, Apr. 29, 2022 *Restoring Confidence in American Elections Panel 3*, The Carter Center

Coffee County Timeline



SOS GC Denies Notice of Potential Coffee County Breach

A. August 2, 2022



Ryan Germany

Secretary of State's
Office Former
General Counsel

Mr. Hall mentions in passing that he chartered “a jet” to go to Coffee County to “scan every freaking ballot.”

19. The recording had not been turned over to our lawyers or to the Secretary's office prior to March 2022 and the Secretary's office was not on notice of Mr. Hall's allegations until receiving the recording.

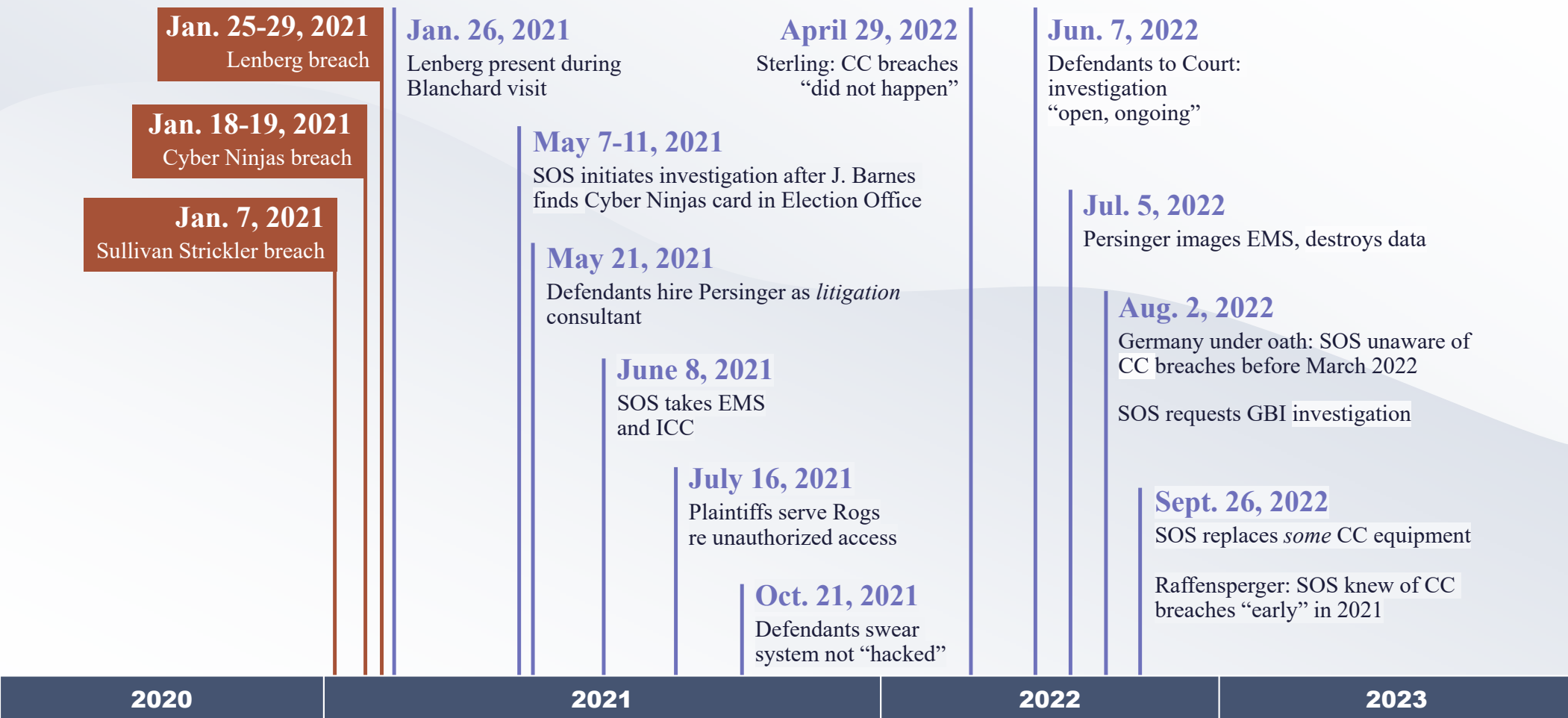
Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing statements are true and accurate to the best of my knowledge, information, and belief.

8/2/22
Date

C. Ryan Germany
C. Ryan Germany
Office of the Georgia Secretary of State

Dckt. 1444-1 at 6 and 9, Mar. 2, 2022 Germany Decl.

Coffee County Timeline



SOS Admits Knowledge of Coffee County Breach “Very Early” in 2021

September 26, 2022



Brad Raffensperger

Secretary of State



PX575, Sept. 26, 2022 11Alive News, Questions raised in timeline of state response to Coffee County breach

9/27/22, 11:46 PM

Coffee County Georgia election breach timeline questions | 11alive.com

POLITICS

Questions raised in timeline of state response to Coffee County breach

The state has presented shifting timelines for when it knew of a breach of Coffee County equipment in January 2021.

Last Thursday, 11Alive's Doug Richards interviewed Secretary Raffensperger and asked him on camera when he first learned about the breach. Raffensperger initially answered January of 2021, but within minutes of answering, an aide to Raffensperger corrected the Secretary of State's response off camera and offered May of 2021 as the correct date.

PX146 at 1, Sept. 27, 2022 11Alive Article, Questions raised in timeline of state response to Coffee County breach



Brad Raffensperger

Secretary of State





Brad Raffensperger

Secretary of State

Dr. Halderman's findings are “not real world”

PX491, Atlanta Press Club, 2022 Newsmaker Leadership Series with Brad Raffensperger (Feb. 10, 2022)

Dr. Halderman's report is a “load of crap”

PX492, Gabriel Sterling, *Leadership in a Time of Crisis*,
Sandy Springs Perimeter Chamber of Commerce (Aug. 10, 2021)



Gabriel Sterling

Chief Operating Officer



3. MITIGATIONS

CISA recommends election officials continue to take and further enhance defensive measures to reduce the risk of exploitation of these vulnerabilities. Specifically, for each election, election officials should:

- Contact Dominion Voting Systems to determine which software and/or firmware updates need to be applied. Dominion Voting Systems reports to CISA that the above vulnerabilities have been addressed in subsequent software versions.
- Ensure all affected devices are physically protected before, during, and after voting.
- Ensure compliance with chain of custody procedures throughout the election cycle.
- Ensure that ImageCast X and the Election Management System (EMS) are not connected to any external (or accessible) networks.
- Ensure careful physical and detective measures (for example, locks, seals) are implemented on affected devices, including on connected printing devices.
- Close any background applications on the ImageCast X device.
- Use read-only media to update the ImageCast X devices.
- Use separate, unique passcodes for each device.
- Ensure all ImageCast X devices are tested pre- and post-election testing.
- Disable the "Unify Tabulation" feature in the election management system and ensure new cryptographic keys are generated.
- As recommended by the system vendor, use a manual method to validate hashes of the system log exports.
- Encourage voters to use human-readable voting methods.
- Conduct rigorous tabulation audits of the human-readable portions of physical ballots and records, to include reviewing ballot chain of custody and conducting voter/ballot reconciliation procedures. These activities are especially crucial to detect attacks where the listed vulnerabilities are exploited such that a barcode is manipulated to be tabulated inconsistently with the human-readable portion of the paper ballot. (**NOTE:** If states and jurisdictions so choose, the ImageCast X provides the configuration option to produce ballots that do not print barcodes for tabulation.)

SEB Chairman Recommends Solution for Georgia Voting System Failures

May 2022



Matthew Mashburn

Former SEB
Chairman

“I would think that the best recourse for the fastest action would be to file a lawsuit and see if you can get a judge to issue a (temporary restraining order).”

Jonathan Raymond, *Expert: Trump lawyers could be subject of criminal investigation into ‘trespass’ of Georgia election system*, 11Alive (Aug. 17, 2022, updated Aug. 20, 2022), <https://www.11alive.com/article/news/politics/trump-lawyers-coffee-county-elections-serverbreach-2020-election-investigation/85-d7fb12f0-e25d-4564-a829-f2f6a2cea32d>